

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
COLUMBUS DIVISION**

DIANE OWENS, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

FIRSTENERGY CORP., CHARLES E.
JONES, JAMES F. PEARSON, STEVEN E.
STRAH and K. JON TAYLOR,

Defendants.

Case No. 2:20-cv-03785-ALM-KAJ

CLASS ACTION

ORAL ARGUMENT REQUESTED

CHAN FRAND, Individually and on
Behalf of ALL Others Similarly Situated,

Plaintiff,

v.

FIRSTENERGY CORP., CHARLES E.
JONES, JAMES F. PEARSON, STEVEN E.
STRAH and K. JON TAYLOR,

Defendants.

Case No. 2:20-cv-04287-JLG-EPD

CLASS ACTION

**MOTION OF STATE TEACHERS RETIREMENT SYSTEM OF OHIO FOR
APPOINTMENT AS LEAD PLAINTIFF, APPROVAL OF ITS SELECTION OF
LEAD COUNSEL, AND CONSOLIDATION OF THE RELATED CASES**

PLEASE TAKE NOTICE that State Teachers Retirement System of Ohio (“Ohio STRS”), by and through its undersigned counsel, hereby respectfully moves this Court for an entry of an order, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”): (1) appointing Ohio STRS as Lead Plaintiff in the above-captioned securities class actions; (2) approving its selection of Bleichmar Fonti & Auld LLP (“BFA”) as Lead Counsel for the Class; (3) consolidating the related securities class actions; and (4) for any such further relief as the Court may deem just and proper.

This motion is made on the grounds that Ohio STRS believes that it is the “most adequate plaintiff” under the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, Ohio STRS believes it has the largest financial interest in the relief sought by the Class in this action by virtue of, among other things, the \$1,692,444.45 in losses as calculated on a first-in, first-out (“FIFO”) basis and the \$1,262,280.88 in losses as calculated on a last-in, first-out (“LIFO”) basis that it incurred on its investments in FirstEnergy securities. Ohio STRS also otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because its claims are typical of other Class members’ claims and because it will fairly and adequately represent the interests of the Class. Moreover, Ohio STRS is the paradigmatic Lead Plaintiff under the PSLRA because it is a sophisticated institutional investor with a substantial financial stake in the litigation, which provides Ohio STRS with the incentive to vigorously represent the Class’s claims and supervise the work of counsel.

Ohio STRS hereby respectfully requests oral argument on this Motion. Ohio STRS believes that oral argument may assist the Court in adjudicating the Lead Plaintiff motions that Ohio STRS anticipates will be filed in this case. Further, the appointment of Lead Plaintiff is an

important matter because the Lead Plaintiff will represent the interests of thousands of absent Class members.

This Motion is supported by the accompanying Memorandum of Law, the Declaration of Gregory M. Utter filed herewith, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Ohio STRS respectfully requests that the Court: (1) appoint Ohio STRS as Lead Plaintiff pursuant to the PSLRA; (2) approve its selection of BFA as Lead Counsel for the Class; (3) consolidate the related securities class actions; and (4) grant any such further relief as the Court may deem just and proper.

DATED: September 28, 2020

Respectfully Submitted,

KEATING MUETHING & KLEKAMP PLL

/s/ Gregory M. Utter

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